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**EQUAL EMPLOYMENT OPPORTUNITY**  
**COMMISSION**

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

EQUAL EMPLOYMENT OPPORTUNITY  
 COMMISSION,

Plaintiff,

v.

AT&T, Inc., dba SBC Yellow Pages,

Defendant.

CIVIL ACTION NO.

COMPLAINT

DEMAND FOR JURY TRIAL

NATURE OF THE ACTION

This is an action under Title VII of the Civil Rights Act of 1964 and Title I of the Civil Rights Act of 1991 to correct unlawful employment practices on the basis of race, and to provide appropriate relief to June Riddick who was adversely affected by such practices. The Plaintiff Equal Employment Opportunity Commission alleges that Defendant AT&T, Inc., dba SBC Yellow Pages denied Ms. Riddick, an African-American employee, promotion opportunities due to her race.

JURISDICTION AND VENUE

1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451, 1331, 1337, 1343 and 1345. This action is authorized and instituted pursuant to Section 706(f)(1) and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e-5(f)(1) and (3) ("Title VII") and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. § 1981a.

INTRADISTRICT ASSIGNMENT

2. The employment practices alleged to be unlawful were committed in Defendant's San Francisco office, which is in the County of San Francisco and within the jurisdiction of the United States District Court for Northern California, San Francisco Division.

PARTIES

3. Plaintiff, the Equal Employment Opportunity Commission (the "Commission" or "EEOC"), is the agency of the United States of America charged with the administration, interpretation and enforcement of Title VII, and is expressly authorized to bring this action by Section 706(f)(1) and (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3).

4. At all relevant times, Defendant, AT&T, Inc., dba SBC Yellow Pages (the "Employer"), a Delaware Corporation, has continuously been doing business in the State of California and the City of San Francisco, and has continuously had at least 15 employees.

5. At all relevant times, Defendant Employer has continuously been an employer engaged in an industry affecting commerce within the meaning of Section 701(b), (g) and (h) of Title VII, 42 U.S.C. § 2000e(b), (g) and (h).

STATEMENT OF CLAIMS

6. More than thirty days prior to the institution of this lawsuit, June Riddick filed a charge with the Commission alleging violations of Title VII by Defendant Employer. All conditions precedent to the institution of this lawsuit have been fulfilled.

7. On or about February 2003, Defendant Employer engaged in unlawful employment practices at its northern California facilities, in violation of Section 703(a)(1) of Title VII, 42 U.S.C. § 2000e-2(a)(1). The unlawful employment practices included, but are not limited to, denying Ms. Riddick a promotion on the basis of her race.

8. The effect of the practice(s) complained of in paragraph 7 above has been to deprive June Riddick of equal employment opportunities and otherwise adversely affect her status as an employee and a promotion applicant, because of her race.

9. The unlawful employment practices complained of in paragraph 7 above were intentional.

1           10.     The unlawful employment practices complained of in paragraph 7 above were  
2 done with malice or with reckless indifference to the federally protected rights of June Riddick.

3                                 PRAYER FOR RELIEF

4           Wherefore, the Commission respectfully requests that this Court:

5           A.     Grant a permanent injunction enjoining Defendant Employer, its officers,  
6 successors, assigns, and all persons in active concert or participation with it, from engaging in  
7 disparate treatment in its hiring and promotion selection and any other employment practice  
8 which discriminates on the basis of race.

9           B.     Order Defendant Employer to institute and carry out policies, practices, and  
10 programs which provide equal employment opportunities for African-American employees, and  
11 which eradicate the effects of its past and present unlawful employment practices.

12          C.     Order Defendant Employer to make whole June Riddick, by providing appropriate  
13 backpay with prejudgment interest, in amounts to be determined at trial, and other affirmative  
14 relief necessary to eradicate the effects of its unlawful employment practices, including but not  
15 limited to promotion of June Riddick.

16          D.     Order Defendant Employer to make whole June Riddick, by providing  
17 compensation for past and future pecuniary losses resulting from the unlawful employment  
18 practices described in paragraph 7 above, including but not limited to employee benefits, plus  
19 interest, in amounts to be determined at trial.

20          E.     Order Defendant Employer to make whole June Riddick by providing  
21 compensation for past and future nonpecuniary losses resulting from the unlawful practices  
22 complained of in paragraph 7 above, including emotional distress, loss of enjoyment of life and  
23 humiliation, in amounts to be determined at trial.

24          F.     Order Defendant employer to pay June Riddick punitive damages for its malicious  
25 and reckless conduct described in paragraph 7 above, in amounts to be determined at trial.

26          G.     Grant such further relief as the Court deems necessary and proper in the public  
27 interest.

28          H.     Award the Commission its costs in this action.

JURY TRIAL DEMAND

The Commission requests a jury trial on all questions of fact raised by its complaint.

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Dated: \_\_\_\_\_  
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